

7. The Movant alleges that the automatic stay should be lifted for cause under 11 U.S.C. 362(d)(1) in that Movant lacks adequate protection of his interest in the leased property as evidenced by the following:
- (a) The Debtor is failing to make post-Petition payments to Movant ;
 - (b) The Debtor has failed to provide Movant with adequate protection in that her Plan and income are insufficient to cure the arrears as required by 11 U.S.C. Section 365(b)(1) ; and
 - (d) The Debtor has no equity in the leased property and it is not necessary to an effective reorganization pursuant to 11 U.S.C. 362(d)(2)(A) and (B).

WHEREFORE, the Movant respectfully requests that this Honorable Court grant the Motion so as to permit Movant to pursue its state court remedies to resume eviction proceedings and for such other relief as may be just and proper.

Respectfully submitted,

/s/Michael H. Kaliner
Michael H. Kaliner, Esquire
Attorney for Emess Management
Adelstein & Kaliner, LLC
3993 Huntingdon Pike, Suite 210
Huntingdon Valley, PA 19006
(215) 230-4250